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MONTANA TWELFTH JUDICIAL DISTRICT COURT, HILL COUNTY

7) Cause No. DV-08-249
8 TERRY PARSONS,)
9 Plaintiff,) COMPLAINT AND JURY DEMAND
10 and)
11 ADM/CHS, LLC.,) CV-09-11-GF-RKS
12 Defendant.)
13

14 COMES NOW the Plaintiff, Terry Parsons, and for his claim for
15 relief alleges as follows:

16 I.

17 At all times pertinent hereto Plaintiff was a resident of Hill
18 County, Montana.

19 II.

20 Defendant, ADM/CHS, LLC. is a Delaware Limited Liability
21 Company with its principal offices located in Inver Grove Heights,
22 Minnesota. Defendant is authorized to conduct business in the
23 State of Montana and has an office located in Havre, Hill County,
24 Montana.
25

III.

Plaintiff was employed with Defendant from May 1, 2005 until he was terminated by the Defendant on January 11, 2008, a period of more than 2 years.

IV.

On or about January 11, 2008, without good cause and contrary to its own written personnel policies, the Defendant wrongfully dismissed Plaintiff and terminated his employment with the Defendant.

V.

The Defendant failed to notify or inform the Plaintiff, within 7 days of his termination, of the existence of any written internal procedures under which he could appeal his termination within the Defendant's organizational structure and failed to supply the Plaintiff with a copy of any written internal procedures

VI.

As a direct and legal result of the wrongful discharge, Plaintiff sustained substantial economic losses, including loss of past and future income, loss of fringe benefits, including but not limited to retirement and health care benefits, attorney's fees and litigation expenses, all to his detriment and damage in an amount to be determined at trial.

WHEREFORE, Plaintiff demands judgment against the Defendant as follows:

1. For lost wages and fringe benefits, together with interest.

2. For costs and expenses; and

3. Any and all other relief which the Court deems proper under the circumstances.

DEMAND FOR JURY TRIAL

10 Plaintiff demands a trial by jury.

11
12 Date this 31st day of December, 2008.

BOSCH, KUHR, DUGDALE,
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